

# SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

463 KING STREET, SUITE B  
CHARLESTON, SC 29403-7204

Facsimile 843-414-7039

March 27, 2018

**Via Electronic Filing**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

RE: In re: Annual Review of Base Rates for Fuel Costs for South Carolina  
Electric & Gas Company  
**Docket Number 2018-2-E**

Dear Ms. Boyd:

Please find attached for electronic filing the *Motion for Admission Pro Hac Vice* and *Verified Application of Katherine Chiles Ottenweller* on behalf of the South Carolina Coastal Conservation League (CCL) and Southern Alliance for Clean Energy (SACE) in the above-referenced matter.

Please contact me if you have any questions concerning this filing.

Sincerely,

s/ J. Blanding Holman, IV  
J. Blanding Holman, IV  
Southern Environmental Law Center  
463 King St., Suite B  
Charleston, SC 29403  
Telephone: (843) 720-5270  
Fax: (843) 414-7039

*Attorney for South Carolina  
Coastal Conservation League and  
Southern Alliance for Clean Energy*

Enclosures  
CC (w/encl.): Parties of Record

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2018-2-E

In re: Annual Review of Base Rates  
for Fuel Costs for South Carolina  
Electric & Gas Company

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**MOTION FOR ADMISSION  
*PRO HAC VICE***

Intervenors South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) hereby move the Public Service Commission of South Carolina (“Commission”) to permit Katherine Chiles Ottenweller to practice pro hac vice before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Ottenweller, with the consent of counsel of record, has submitted to the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, CCL and SACE respectfully request that this motion be granted.

This 27<sup>th</sup> day of March, 2018.

s/ J. Blanding Holman, IV  
J. Blanding Holman, IV  
Southern Environmental Law Center  
463 King Street, Suite B  
Charleston, SC 29403  
Telephone: (843) 720-5270  
Fax: (843) 414-7039

*Attorney for South Carolina Coastal  
Conservation League and Southern Alliance  
for Clean Energy*

# VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA

Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company <hr/> <b>Plaintiff</b>	Docket No. 2018-2-E <hr/> <b>Case No.</b>	Public Service Commission of South Carolina <hr/> <b>Tribunal</b>
vs.		
<hr/> <b>Defendant</b>	Mailing Address of Tribunal: <u>101 Executive Center Drive</u> <u>Suite 100</u> <u>Columbia, SC 29210</u>	

Comes now Katherine Chiles Ottenweller, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
151 Estoria Street SE  


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Street Address	<u>Atlanta</u>	<u>Fulton</u>	<u>GA</u>
City		County	State
<u>706-224-8017</u>			<u>30316</u>
Telephone			Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)  
Southern Environmental Law Center, with offices at  
Ten 10<sup>th</sup> Street NW, Suite 1050  


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Street Address	<u>Atlanta</u>	<u>Fulton</u>	<u>GA</u>
City		County	State
<u>404-521-9900</u>		<u>706-224-8017</u>	<u>404-521-9909</u>
Primary Telephone	Cell Phone	Fax Number	Zip Code
			<u>kottenweller@selcga.org</u>
			Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by  
South Carolina Coastal Conservation League and Southern Alliance for  
Clean Energy to provide legal representation in  
 connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since July 15<sup>th</sup> of 2011, applicant has been, and presently is, a  
 member in good standing of the bar of the highest court of the District of Columbia or the State of  
Georgia where applicant regularly practices law. Attached is a certificate of good  
 standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State  
 where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts  
 applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of  
 Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

<b>Court:</b>	<b>Date Admitted:</b>
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Court:	Date Admitted:
All courts of the Commonwealth of Pennsylvania (by admission to the PA Bar)	10/26/2009

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Bar of the Commonwealth of Pennsylvania (& all associated courts)-inactive status

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is J. Blanding Holman IV  
of the Southern Environmental Law Center law firm, which has offices at:

463 King Street, Suite B

Street Address

Charleston

City

(843) 720-5270

Primary Telephone

72260

South Carolina Bar Number

Charleston

County

(919) 302-6819

Cell Phone

SC

State

(843) 414-7039

Fax Number

29403

Zip Code

bholman@selcsc.org

Email Address

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional

Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 21<sup>st</sup> day of March, 20 10



APPLICANT

**VERIFICATION**STATE OF South Carolina )COUNTY OF Charleston )

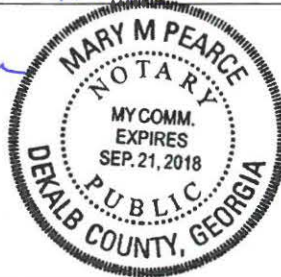
I, Katherine Chiles Ottenweller, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

[Signature]  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 21st day of March, 20 18

Mary Margaret Peafue Mack, Jr. 720

Notary Public for the State of Georgia  
My Commission Expires: 9/21/18

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 21st day of March, 20 18

J. Blanding Holman, IV with express permission by  
LOCAL COUNSEL OF RECORD [Signature]

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

21st day of March, 20 18

[Signature]  
APPLICANT/AFFIANT





# State Bar of Georgia

*Lawyers Serving the Public and the Justice System*

**Ms. Katherine Chiles Ottenweller**  
**Southern Environmental Law Center**  
**Ten 10th Street NW, Suite 1050**  
**Atlanta, GA 30309**

**CURRENT STATUS:** Active Member-Good Standing  
**DATE OF ADMISSION:** 07/15/2011  
**BAR NUMBER:** 918668  
**TODAY'S DATE:** 03/22/2018

The prerequisites for practicing law in the State of Georgia are as follows:

- **Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).**
- **Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.**
- **Enrolled with the State Bar of Georgia, administrative arm of the Supreme Court of Georgia.**

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition	Date
N/A	N/A	N/A	N/A



## STATE BAR OF GEORGIA

*Brinda Lorrison*

Official Representative of the State Bar of Georgia

### HEADQUARTERS

104 Marietta St. NW, Suite 100  
Atlanta, GA 30303-2743  
404-527-8700 • 800-334-6865  
Fax 404-527-8717  
[www.gabar.org](http://www.gabar.org)

### COASTAL GEORGIA OFFICE

18 E. Bay St.  
Savannah, GA 31401-1225  
912-239-9910 • 877-239-9910  
Fax 912-239-9970

### SOUTH GEORGIA OFFICE

244 E. 2nd St. (31794)  
P.O. Box 1390  
Tifton, GA 31793-1390  
229-387-0446 • 800-330-0446  
Fax 229-382-7435



STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-2-E

In re: Annual Review of Base Rates  
for Fuel Costs for South Carolina  
Electric & Gas Company

**CERTIFICATE OF SERVICE**

I certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified Application by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

Andrew M. Bateman  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
abateman@regstaff.sc.gov

K. Chad Burgess  
South Carolina Electric & Gas Company  
220 Operation Way - MC C222  
Cayce, SC 29033  
chad.burgess@scana.com

Alexander G. Shissias  
The Shissias Law Firm, LLC  
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alex@shissiaslawfirm.com

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1401 Main Street, Suite 900  
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jpittman@regstaff.sc.gov

Timothy F. Rogers  
Austin and Rogers, P.A.  
Post Office Box 11716  
Columbia, SC 29201  
tfrogers@austinrogerspa.com

This 27<sup>th</sup> day of March, 2018.

s/ Andrea Rachel Pruzin